

**STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT COURT**

MARIO MUNIZ,

Plaintiff,

v.

Cause No. D-202-CV-2021-06292

**PANDA EXPRESS, INC, a Foreign
Corporation, and JOHN DOES 1
through 3,**

Defendants.

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT PANDA EXPRESS, INC.**

Pursuant to Rules 1-026 and 1-033, Rules of Civil Procedure for the District Courts, you are required to answer the following Interrogatories, in writing and under oath, and serve your responses hereto on the counsel for Plaintiff, Smith Templeman Law Firm, LLC (Roger I. Smith), 1306B Rio Grande Blvd. NW, Albuquerque, NM 87104 within forty-five (45) days from date of service hereof. In answering these Interrogatories, you are required to exercise reasonable diligence to obtain information, which is available to you, but which may not be within your immediate possession or custody.

Your failure to comply with the requirements of Rules 1-026 and 1-033, Rules of Civil Procedure for the District Courts, will lead to Plaintiff seeking sanctions against you pursuant to Rule 1-037, Rules of Civil Procedure for the District Courts, including, but not limited to, assessment of attorney's fees, exclusion of evidence at trial, and entry of Judgment against you in

INTERROGATORY NO. 19:

Please Identify all Panda Express, Inc. employees who were present at the restaurant that is located at 3601 Bosque Plaza Lane in Albuquerque, New Mexico at the time of Plaintiff's fall which occurred on January 18, 2020. In answering this interrogatory, please provide the position held at the time, the job title, and current contact information for each such employee.

ANSWER: